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 DIGITAL REALTY TRUST, INC.  
 and ELLEN JACOBS

Attorneys for Plaintiff  
 PAUL SOMERS

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

PAUL SOMERS, an individual,  
  
 Plaintiff,  
  
 v.

Case No. 3:14-cv-05180 EMC

**STIPULATION TO STAY DISCOVERY;  
~~[PROPOSED]~~ ORDER**

DIGITAL REALTY TRUST, INC., a Maryland  
 corporation; ELLEN JACOBS, an individual, and  
 DOES ONE through TEN, inclusive,  
  
 Defendants.

Plaintiff PAUL SOMERS (“Plaintiff”) and Defendants DIGITAL REALTY TRUST, INC.  
 (“Digital”) and ELLEN JACOBS (collectively, “Defendants”), by and through their respective attorneys  
 (the “Parties”), hereby submit the following Stipulated Request:

1           1.       The Parties stipulate that a discovery stay shall go into effect until the Court issues an  
2 Order regarding Digital's Motion to Dismiss (Dock. No. 20) set for hearing on April 30, 2015 at 1:30  
3 p.m.

4           2.       The Parties further stipulate that good cause exists for this stay on discovery since an  
5 order granting Digital's Motion to Dismiss Plaintiff's second cause of action for Whistleblower claims  
6 will materially change the factual issues requiring discovery.

7           3.       The Parties further stipulate that no undue prejudice will be suffered by either party as a  
8 result of the proposed discovery stay.

9           This stipulation is executed and filed pursuant to Local Rule 6-1(a). No prior discovery stays  
10 have been agreed upon.

11           SO STIPULATED.

12           DATED: March 31, 2015

Respectfully submitted,

SEYFARTH SHAW LLP

15 By: /s/ Brian T. Ashe

Brian T. Ashe

Kyle A. Petersen (admitted *pro hac vice*)

Daniel C. Kim

18 Attorneys for Defendant  
DIGITAL REALTY TRUST  
and ELLEN JACOBS

STEPHEN F. HENRY, ESQ.

20           DATED: March 27, 2015

22 By: /s/ Stephen F. Henry

Stephen F. Henry

24 Attorneys for Plaintiff  
PAUL SOMERSON

26           It is so ORDERED.

27           Dated:       April 6, 2015  
28           \_\_\_\_\_

Hon. Edward M. Chen

